



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 13, 2014

Professor Andrew Hurley
Department of History
University of Missouri-St. Louis
1 University Blvd.
St. Louis, MO 63121

Re: Freedom of Information Act Request EPA-R9-2014-003422

Dear Mr. Hurley:

This letter supplements EPA's June 19, 2014, response to your Freedom of Information Act request for

documents that might shed light on land-uses and material flows at these sites up to the discovery of contamination. This would include any information about the chain of ownership and especially the chain of commercial/industrial activities at the site. For each type of activity, I am interested in the source of incoming materials (e.g. raw materials used in industrial processes, geographic origin and type of waste deposited in landfill) as well as the destination of finished products (i.e. purchasers of manufactured or reprocessed commodities.)

In conjunction with its June 19th response, EPA released to you most of the United Heckathorn Superfund Site documents that were both responsive to your FOIA request and publicly releasable. This letter attaches a few additional releasable documents and addresses certain additional documents related to the United Heckathorn Site that are responsive to your FOIA request.

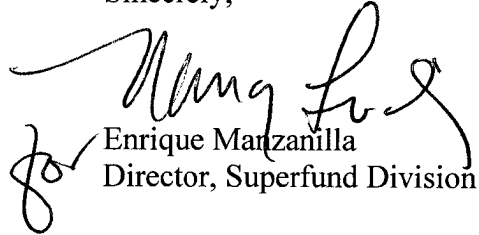
EPA has determined that the remaining United Heckathorn documents identified as responsive to your request are exempt from mandatory disclosure pursuant to 5 U.S.C. §§552(b)(5) and/or (b)(7). The exempt documents are subject to one or more of the following: attorney-client privilege, attorney work product protection, or a protective order issued by a court in the United Heckathorn litigation. A list of the withheld material by category, along with the basis for withholding, is provided on the enclosure to this letter.

You may appeal this partial denial to the National Freedom of Information Officer, U.S. EPA, FOIA and Privacy Branch, 1200 Pennsylvania Avenue, N.W. (2822T), Washington, DC 20460 (U.S. Postal Service Only), FAX: (202) 566-2147, E-mail: hq.foia@epa.gov. Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, NW. If you are submitting your appeal via hand delivery, courier service or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, N.W., Room 6416J,

Washington, DC 20004. Your appeal must be made in writing, and it must be submitted no later than 30 calendar days from the date of this letter. The Agency will not consider appeals received after the 30 calendar day limit. The appeal may include as much or as little related information as you wish, as long as it clearly identifies the determination being appealed and includes the assigned FOIA request number: EPA-R9-2014-003422. For the quickest possible handling, the appeal letter and its envelope should be marked "Freedom of Information Act Appeal."

Please contact Taly Jolish at (415) 972-3925, the attorney currently assigned to the United Heckathorn matter, should you have any questions concerning this matter.

Sincerely,



Enrique Manzanilla
Director, Superfund Division

Enclosure

Freedom of Information Act Request EPA-R9-2014-003422
Attachment to EPA Response

Produced Material
United Heckathorn Documents

Doc ID	Date	Description	Author	Addressee
88208088	9/3/1996	Memo: Description of 4 off-site waste disposal facilities - Midway, CO, Butterfield, AZ, Kettleman & ECDC, UT	Dick Vesperman / Environmental Protection Agency - Region 9	Nathan Lau / Environmental Protection Agency - Region 9
88208057	9/4/1996	Memo: EPA Region 8 sends Superfund, non-RCRA waste to East Carbon Development Corp landfill in Utah	Clinton Seiter / Environmental Protection Agency - Region 9	Nathan Lau / Environmental Protection Agency - Region 9
88205747	1/9/1992	Ltr: Events re Levin purchase of property from Parr-Richmond Terminal, w/attchs	Roger Pool / Farella, Braun & Martel (Attorneys)	John Lyons / Environmental Protection Agency - Region 9 Office of Regional Counsel
2256855	12/7/90	Documents attached to ltr addressed to Geoffrey Kors	Parr-Richmond Terminal Co	Geoffrey Kors / Environmental Protection Agency - Region 9 Office of Regional Counsel

Withheld Material
United Heckathorn Documents

Description of Document	Number in Category	FOIA Exemption
Memoranda addressed to Andrew Lincoff	2	Exemption 5 (attorney-client communication, attorney work product), Exemption 7
Deposition Transcripts from litigation matter (<u>Levin Metals Corp., et al v. Parr-Richmond Terminal Co., et al</u> , CV 84 06273 (N.D. Cal))	56	Exemption 5 (court order)